

## **REMARKS/ARGUMENTS**

Applicants have received the Office Action dated March 8, 2007 (hereinafter "Office Action"), in which the Examiner rejected claims 1-27 under 35 U.S.C. § 102(e) as being allegedly anticipated by Willes, Jr. (U.S. Pub. No. 2003/0055883, hereinafter "Willes"). With this Response, Applicants have amended claim 13. Based upon the arguments presented below, Applicants believe all claims to be in condition for allowance.

### **I. THE CLAIM REJECTIONS**

Regarding independent claim 1, the Examiner stated that Willes discloses a method that includes, among other things, "generating a network representation," "parsing the network representation," and "generating a network model using the parsed network representation." Office Action, ¶ 3. Applicants respectfully traverse the Examiner's characterization of the cited art, noting that Willes teaches performing XML token parsing, and using XML data report contents to discover domain topology configuration information. Willes, ¶ [0132] and ¶¶ [0153-0154]. The domain topology configuration information so discovered is stored in a domain topology table in XML format, and changes to the table are detected by the XML parser. Willes, ¶¶ [0156-0161]. The domain topology table contains the layout of the site or sites that require monitoring, and include the domain name, web server names, Internet Protocol (IP) address, and port information. Willes, ¶¶ [0156-0160]. A domain view, representing the status of a domain, is generated based in part on the list of discovered domains. Willes, ¶¶ [0184-0185].

Thus, Willes teaches generating a representation of a domain that is used, in part, to produce a domain view used to represent the status of the domain. Willes does not teach or even suggest parsing a network representation and generating a network model from the parsed network representation. Willes instead parses the received XML data as part of the process of *generating* and *updating* a representation of a domain, and does not teach or even suggest generating a model of any kind. Willes further does not teach or even suggest "storing the network model in memory," also as required by claim 1. For at least

these reasons, Applicants submit that independent claim 1, as well as those claims that depend upon it, are in condition for allowance

Additionally, Willes does not teach or even suggest a network model “including a plurality of network objects and relationships between the plurality of network objects,” as required by claim 1. The first citation referenced by the Examiner regarding this claim element describes a hierarchical relationship of clients, servers and a site monitor illustrated by Figure 5 of the disclosure (Willes, ¶ [0065]). The second citation referenced by the Examiner describes the processing of HTML objects (Willes, ¶ [0286]) as part of the process of generating an XML report (Willes, ¶ [0287]). Neither of these citations refers to a model, a plurality of network objects included within a model, or relationships between a plurality of network objects included within a model. For at least these reasons, Applicants respectfully submit that independent claim 1, and all claims that depend upon it, are in condition for allowance.

Regarding independent claim 12, the claim requires “parsing the network representation,” “generating a network model using the parsed network representation, the network model including a plurality of network objects and relationships between the plurality of network objects” and “storing the network model in memory.” For at least the reasons discussed above with regard to independent claim 1, Applicants respectfully submit that independent claim 12, as well as those claims that depend upon it, are all in condition for allowance.

Regarding independent claim 13, the claim requires “parsing the network representation,” “generating a network model using the parsed network representation, the network model including a plurality of network objects” and “storing the network model in the one or more memories.” For reasons similar to at least the reasons discussed above with regard to independent claim 1, Applicants respectfully submit that independent claim 13, as well as those claims that depend upon it, are all in condition for allowance.

Regarding independent claim 20, the claim requires “parsing the network representation” and “generating a network model using the parsed network representation, the network model including a plurality of network objects and

relationships between the plurality of network objects.” For reasons similar to at least the reasons discussed above with regard to independent claim 1, Applicants respectfully submit that independent claim 20, as well as those claims that depend upon it, are all in condition for allowance.

Regarding independent claim 23, the claim requires computer readable code that includes instructions to “parse the network representation,” and to “generate a network model using the parsed network representation.” For reasons similar to at least the reasons discussed above with regard to independent claim 1, Applicants respectfully submit that independent claim 23, and all claims the depend upon it, are in condition for allowance.

Regarding independent claim 27, the claim requires “means for representing a plurality of network objects and relationships between the plurality of network objects on the communications network,” “means for generating a network model using the representing means” and “means for storing the network model.” For reasons similar to at least the reasons discussed above with regard to independent claim 1, Applicants respectfully submit that independent claim 27 is in condition for allowance.

## **II. AMENDMENT TO CLAIM 13**

Applicants note that independent claim 13 has been amended to correct a typographical error. Specifically, “mor” has been corrected to read “more.” This correction reflects a correction already incorporated by the Office in the Patent Application Publication corresponding to the subject application (U.S. Pat. App. Pub. 2005/015471). The amendment has not been made in response to any rejection and does not alter the scope of the claim.

## **III. CONCLUSION**

In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may

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be other distinctions between the claims and the cited art which have yet to be raised, but which may be raised in the future.

Applicants respectfully request reconsideration and that a timely Notice of Allowance be issued in this case. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "R. de Leon", is written over a horizontal line.

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